

EXHIBIT C



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LEE ANN TEUMER,

*

Plaintiff,

*

vs.

*

CASE NO. DR-2017-

VICTOR ROLAND TEUMER,

*

Defendant.

*

PETITION FOR DIVORCE

**TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA:**

Comes now the Plaintiff, **LEE ANN TEUMER**, by and through her attorney, Kenneth R. Raines, in the above-styled cause, and shows unto this Honorable Court, as a basis for the relief prayed, the following facts, to-wit:

1. The Plaintiff, **LEE ANN TEUMER**, and the Defendant, **VICTOR ROLAND TEUMER**, are both over the age of nineteen (19) years.

2. The Plaintiff and Defendant have both been resident citizens of Baldwin County, Alabama for a period in excess of six (6) months immediately preceding the filing of this Petition for Divorce.

3. The Plaintiff and Defendant were married on April 22, 1989, in Nashville, Davidson County, Tennessee.

4. Plaintiff avers that subsequent to the marriage of Plaintiff and Defendant, there has developed and now exists such a complete incompatibility of

temperaments between them that they can no longer live together as husband and wife. Due to the incompatibility of temperaments between them, there has been an irretrievable breakdown of their marriage, and any further attempt at reconciliation would be futile and not in their best interest.

5. Plaintiff avers that subsequent to the marriage of Plaintiff and Defendant, the Defendant has had an adulterous affair with another person and said adultery has contributed to the breakdown of the marriage. Due to this adultery, there has been an irretrievable breakdown of the marriage, and any further attempt at reconciliation would be futile and not in their best interest.

6. Plaintiff further avers that subsequent to the marriage of the Plaintiff and the Defendant, the Defendant has routinely abused alcohol and become a chronic alcoholic. Just last year, the Defendant got out of another, in a long list of rehabilitation programs, dealing with his alcoholism. Said alcoholism also contributed to the breakdown of the marriage.

7. Plaintiff avers that the parties have obtained various marital properties and assets that need to be equitably divided between them by the court and the Plaintiff avers that the parties have obtained various debts between them that need to be equitably divided between them by the court.

8. In addition, due to the parties' economic station in life, needs of the Plaintiff, lifestyle of the parties, and Defendant's ability to pay, the Plaintiff is

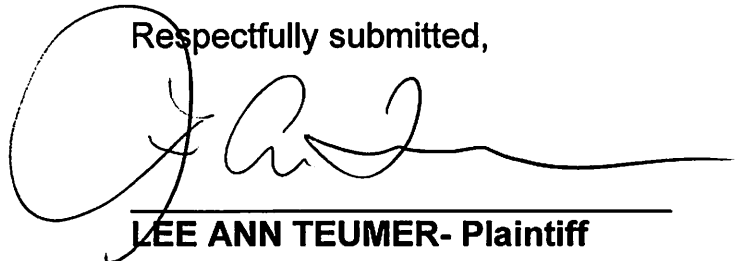
requesting the Court to enter an order of permanent and periodic alimony to be awarded to the Plaintiff.

WHEREFORE, THE PREMISES CONSIDERED, Plaintiff respectfully prays that upon the filing of the Petition for Divorce, this Honorable Court will cause its usual writ of process to be issued to the Defendant requiring him to answer or plead to the same within the time allowed by law and the practice of this Honorable Court.

PREMISES CONSIDERED, Plaintiff further prays that upon a final hearing of the pleadings and proof herein, Your Honor will grant to the Plaintiff a complete divorce from the bonds of matrimony with the Defendant on the grounds of adultery, incompatibility, chronic alcoholism, an equitable division of all real and personal property owned by the parties as well as the marital debts, permanent and periodic alimony, attorney's fees and costs.

Plaintiff further prays for such other, further and general relief to which she may be entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lee Ann Teumer', is written over a horizontal line. The signature is fluid and cursive.

LEE ANN TEUMER- Plaintiff

**KENNETH R. RAINES (RAI007)**

Attorney for Plaintiff

P. O. Box 453

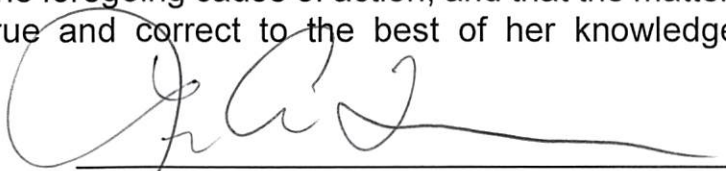
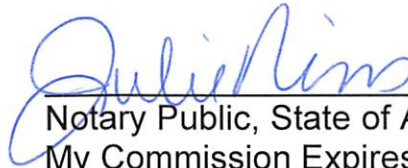
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kraines@raineslawfirm.comSTATE OF ALABAMA
COUNTY OF BALDWIN

Before me, the undersigned authority, personally appeared **LEE ANN TEUMER**, known to me, and who being by me first duly and legally sworn, under oath doth depose and say as follows:

That she is the Plaintiff in the foregoing cause of action, and that the matters and facts alleged herein are true and correct to the best of her knowledge, information and belief.


LEE ANN TEUMER - PlaintiffSWORN to and subscribed before me this 18 day of September, 2017.

Notary Public, State of Alabama

My Commission Expires: Notary Public - Alabama State At Large

My Commission Expires

November 18, 2017

Bonded Thru Notary Public Underwriters

